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Of Attorneys for Defendants

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

JOSEPH HABER, an individual; et al.,

3:17-cv-01827-PK

PLAINTIFFS,

v.

STIPULATED PROTECTIVE
ORDER

CITY OF PORTLAND, a municipal corporation;
et al.,

DEFENDANTS.

Pursuant to Fed. R. Civ. P. 26(c)(1) and (2), it is hereby stipulated and agreed by and between the respective parties hereto by their counsel of record the following:

1. Any video or digital recording of the deposition of any plaintiff or defendant, or any officer, agent, employee or former employee of defendant City of Portland, shall be used only for purposes of this litigation.
2. No person shall disseminate the video or digital recording of a deposition to anyone not listed as an attorney of record, their legal assistants and support staff, or experts retained in this litigation. However, the parties agree that named plaintiffs and named defendants may view the video or digital recordings of depositions.
3. To the extent a video or digital recording of a deposition includes material designated for protection under the terms of the stipulated protective order previously entered in this matter (Dkt # 29) or any other similar order, such recording or portion thereof shall be filed under seal if used prior to trial. The use of any video or digital recording of a deposition at or after trial shall be subject to further order of the court.
4. This Stipulated Protective Order shall remain in effect until agreed otherwise by written stipulation signed by counsel for the parties hereto and filed herein, or until modified or terminated by order of this Court upon good cause being shown.

IT IS SO STIPULATED:

/s/ Steven M. Wilker
Steven M. Wilker | Sarah M. Einowski
Alexander M. Tinker | Megan R. Reuther
*Cooperating Attorneys for ACLU Foundation
Of Oregon, Inc.*
Attorneys for Plaintiffs

Dated: June 7, 2018

/s/ Matthew dos Santos
Matthew dos Santos | Kelly Simon
Attorneys for Plaintiffs

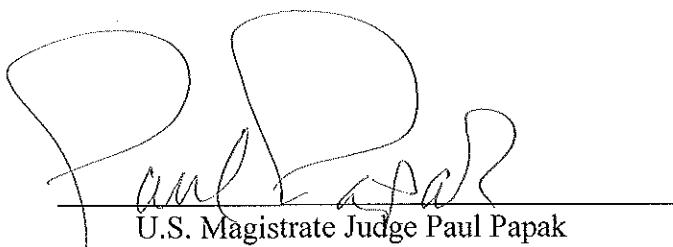
Dated: June 7, 2018

/s/ Naomi Sheffield
William W. Manlove | Naomi Sheffield
Attorneys for Defendants

Dated: June 7, 2018

THIS STIPULATED PROTECTIVE ORDER IS HEREBY APPROVED.

DATED: June 7th, 2018.



A handwritten signature in black ink, appearing to read "Paul Papak", is written over a horizontal line. Below the signature, the text "U.S. Magistrate Judge Paul Papak" is printed in a smaller, sans-serif font.